

Filing # 121268048 E-Filed 02/11/2021 04:43:42 PM

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA**

EMMETT MOORE, an individual,

Plaintiff,

v.

Case No.:

EDWARD BUCKLEY, (a/k/a MATTHEW BUCKLEY), an individual; and TOP GUN OPTIONS, LLC, a corporation; and DOES 1 through 25, inclusive

Defendants.

\_\_\_\_\_/

Plaintiff EMMETT MOORE (“Mr. Moore” or “Plaintiff”) files this Complaint for Damages against Defendants EDWARD BUCKLEY, (a/k/a “MATTHEW BUCKLEY”) (hereinafter “Mr. Buckley”), TOP GUN OPTIONS, LLC, (collectively, “Defendants”), and DOES 1 through 25, and in support states as follows:

**NATURE OF THE ACTION**

1. This is an action against Defendants based on conduct that constitutes defamation *per se*, and violation of Florida’s Deceptive and Unfair Trade Practices Act (“FDUTPA”).
2. By this action, Plaintiff seeks compensatory damages, punitive damages, injunctive relief, costs, attorneys’ fees, and all other relief to which he may be entitled to as a matter of law.

**PARTIES, JURISDICTION AND VENUE**

3. This Court has jurisdiction over the subject matter of Plaintiff’s claims pursuant to Florida Statute Sec. 26.012 because the matter in controversy is \$45,000, exclusive of interest and costs.

4. Venue is proper in Palm Beach County, Florida, pursuant to Florida Statutes §§ 47.011 and 47.021. Defendant Mr. Buckley and Defendant Top Gun Options, LLC, whose sole member is Mr. Buckley, are citizens of Boca Raton, Florida. Defendants Mr. Buckley and Top Gun Options, LLC, engaged Does 1 through 25 to further defame Plaintiff within this county, and therefore further conducted business within this county relevant to Plaintiff's claims.

5. This Court may exercise personal jurisdiction over Defendant Top Gun Options, LLC, pursuant to Florida Statute § 48.193, as it is a limited liability company, with its sole member being Plaintiff Mr. Edward Matthew Buckley, and it is a citizen of this state, and a resident of Boca Raton, Florida which is in this county.

6. Personal jurisdiction over Defendant Mr. Buckley is proper, pursuant to Florida Statute § 48.193, as Mr. Buckley is a citizen and resident of this state, and of Boca Raton, Florida which is in this county.

7. In addition, because the facts, allegations and causes of action arose in this jurisdiction, Plaintiff was defamed in this jurisdiction, citizens of this jurisdiction reviewed the defamatory statements that caused damage to Plaintiff in this jurisdiction, sufficient contacts with this jurisdiction and county exist for this Court to exercise specific personal jurisdiction over Defendants and Does 1 through 25 under Florida Statute § 48.193.

8. Plaintiff is an individual and citizen of Vista, California.

#### **FACTUAL ALLEGATIONS**

##### **A. Plaintiff's Background**

9. Mr. Moore owns and operates an interactive website, located at [www.tradingschools.org](http://www.tradingschools.org).

10. Mr. Moore authors and publishes content for the public's consumption regarding investment fraud, investment services, investment software, and investment educational materials that are provided by various individuals and vendors.
11. Mr. Moore began authoring and publishing material on his website in approximately 2014.
12. Mr. Moore's website content contains unbiased, informational articles regarding trading and investment products and services.
13. Mr. Moore frequently works with law enforcement, such as the Commodity Futures Trading Commission (CFTC), the Federal Trade Commission (FTC), the United States Securities and Exchange Commission (SEC), and the Federal Bureau of Investigation (FBI), with respect to certain individuals and companies engaging in violation of securities laws, and investment fraud.
14. Mr. Moore's work is not without risk—Plaintiff has been threatened with, and defended lawsuits in the past regarding his work exposing fraud.
15. Mr. Moore was once was the target of a “murder for hire” crime that was thwarted by law enforcement. The motivation of the alleged crime was because Mr. Moore exposed the fraudulent activities of an unlicensed and unregistered investment advisor.
16. The vast majority of Mr. Moore's compensation for authoring and publishing reviews is in the form of advertising revenue.
17. Mr. Moore has also been the eligible recipient of numerous whistleblower actions regarding violations of the Commodity Exchange Act.

18. Recently, Mr. Moore provided key evidence that the Federal Trade Commission used to seize the company assets of a company named Raging Bull, which purportedly scammed consumers out of \$137 million dollars in an investment education scheme.

19. Mr. Moore provided key evidence to the CFTC in their prosecution of another investment educational scheme named "School Of Trade" which resulted in a \$4.9 million dollar restitution order.

20. Mr. Moore provided key evidence to the Federal Bureau of Investigation in their apprehension of Michael Salerno, an individual running a \$76 million dollar investment fraud and now facing 30 charges of securities fraud and multiple decades in federal prison.

21. In the past 6 years, Mr. Moore has assisted law enforcement in dozens of investment fraud schemes resulting in numerous convictions, restitution, and industry banishment.

22. Mr. Moore authors neutral or negative reviews when he discovers potentially fraudulent or misleading activity for an individual or entity in the trading services industry.

23. Mr. Moore neither charges companies or individuals for writing positive material, nor does he ask for or receive payment for not writing material.

#### **B. Background on the Named Defendants**

24. Top Gun Options, LLC, is a company that holds itself out as a financial consultant and educational service provider.

25. Top Gun Options, LLC was formed in approximately 2011, by Mr. Buckley, after he unsuccessfully sued his prior employer, Peak6 Investments, LLC, for wrongful termination.

26. Top Gun Options, LLC was formerly co-owned by Brett Fogle of Options University, LLC, and on information and belief, Mr. Fogle sold his share of Top Gun Options after the Attorney General of the State of Florida investigated actions and omissions of both Mr. Buckley

and Mr. Fogle regarding consumer fraud relating to an investment education platform, Case Number L-12-31035.

27. Top Gun Options, LLC markets its investment educational services on the internet to a worldwide population.

28. Top Gun Options, LLC, solicits individuals to subscribe to its educational services with monthly, annual or promotional subscriptions.

29. Top Gun Options, LLC's marketing promises individuals that they can become successful investors and earn significant profit if they watch and listen to Mr. Buckley's trading on "fake" "simulated" or "paper" trading—in other words, trades that are not actual, monetary trades in or on the "live" market.

30. On information and belief, Mr. Buckley is the sole owner, co-founder, and current CEO of Top Gun Options, LLC.

31. Mr. Buckley has said his experience in trading and options trading started when he was on active duty with the U.S. Navy.

32. Mr. Buckley has stated under oath in *Edward Buckley v. Peak6 Media, LLC*, Case No.: 1:10-cv-03901 (N.D. IL, 2010) that over the course of approximately a decade, his options trading resulted in a substantial, monetary loss.

33. On information and belief, Mr. Buckley does not have a habit of showing live, actual performance of trades in the market, aside from acknowledging significant losses he suffered as an options trader under oath.

34. Mr. Buckley has no known educational credentials or licensing credentials that support a contention that he is a successful, experienced or knowledgeable trader or options trader.

35. On information and belief, Mr. Buckley operates several brokerage accounts for individuals, despite not being known to be licensed by FINRA (the Financial Industry Regulatory Authority) or the SEC as a financial advisor or asset manager.<sup>1</sup> Said operation and management of brokerage accounts on behalf of other individuals is believed to be illegal pursuant to the Investment Advisors Act of 1940 and Florida Statutes Sec. 517.021 *et seq.*

36. On information and belief, Top Gun Options LLC, has not had an experienced and knowledgeable options trader in its employment for many years, if ever.

37. Part of Mr. Buckley and Top Gun Options, LLC's marketing on how to trade involves Mr. Buckley's theory of politics, and his self-proclaimed insider connections with individuals in high levels of government.

38. For example, Mr. Buckley once advised his members and the general public to take a position in the market because Mr. Buckley believed there would be a terrorist attack on then President Donald J. Trump's properties in 2017.

39. In other instances, Mr. Buckley alluded to the fact he personally knew Steven Mnuchin through a family member, and that he knows people "physically close" to the then President of the United States, Donald Trump.

40. A key aspect of Mr. Buckley and Top Gun Options, LLC's marketing is through Facebook.com, YouTube.com, and Twitter.com.

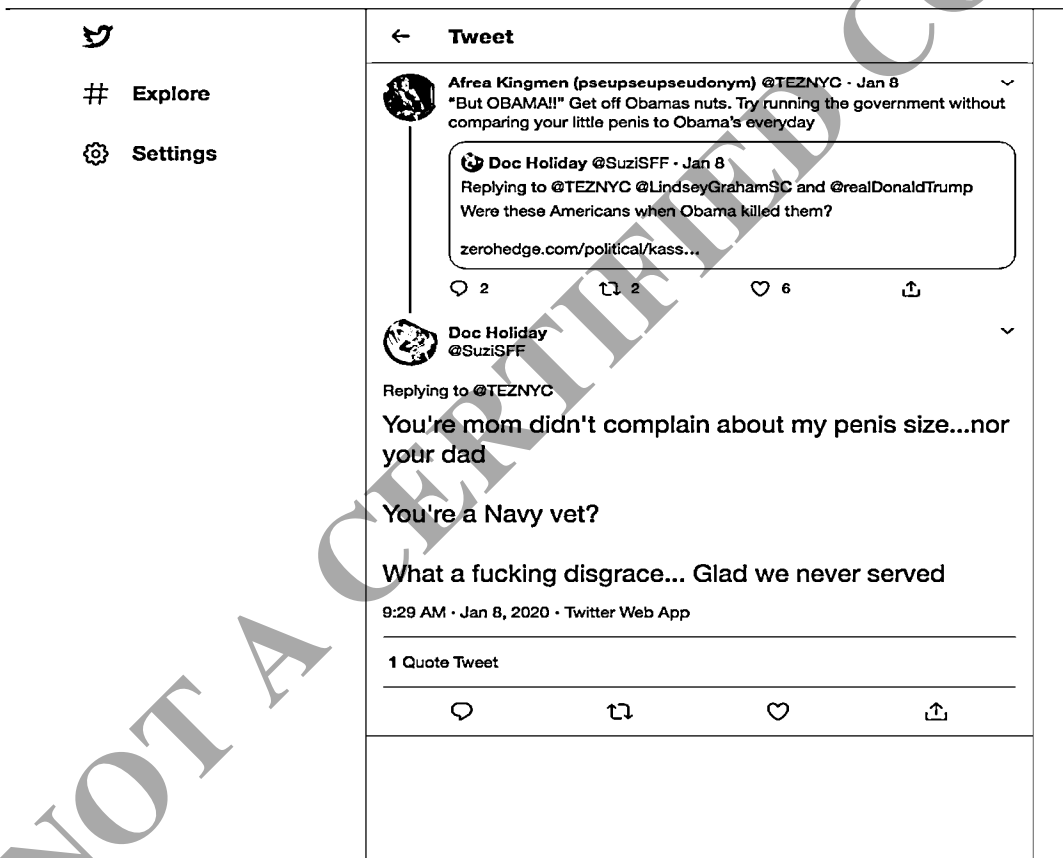
41. Said marketing involves Mr. Buckley and Top Gun Options, LLC's "political" forecasts that he alleges affect and move the market into various positions.

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<sup>1</sup> Nor are Defendants registered with Florida's Office of Financial Regulation as managers of securities or associated persons for securities management.

42. Mr. Buckley, on behalf of Top Gun Options, LLC, has advocated for violence, even murder of people who don't share their radical ideology on their Facebook and Twitter profiles / pages, including the murdering of journalists.

43. On information and belief, Top Gun Options, LLC and Mr. Buckley advocate for civil unrest, civil war, and hate/violence on such a regular basis that several of their social media accounts have been suspended or terminated for violation of terms of service and/or social media or platform rules. A few examples of his prolific online rhetoric are as follows:



a.

On information and belief, the Twitter handle "Doc Holiday @SuziSFF" is Defendant Mr. Buckley, but the account was recently suspended for presumed platform rule violations.

**Page Transparency** See All


Facebook is showing information to help you better understand the purpose of a Page. See actions taken by the people who manage and post content.

- Page created - July 11, 2011
- Page manager location: United States

**Top Gun Options**  
21h · 🌐

Against all enemies  
Foreign  
and Domestic




Civil War 2 is here...are you armed and ready to protect yourself, your family, and your way of life?  
Or you gonna kneel to the mob?  
I know what side I'm on



THE DAILY BEAST.COM  
**The Left Secretly Preps for MAGA Violence After Election Day**

👍 13      1 Comment 1 Share

**Related Pages**

-  **The Tailhook Associati...**  
Nonprofit Organization Like
-  **Simpler Trading**  
Financial Service Like
-  **Navellier Growth**  
Financial Service Like


**Add Your Business to Facebook**

Showcase your work, create ads and connect with customers or supporters.

b.

**Top Gun Options**  
March 11 · 🌐

WOW... Another domestic enemy to add to the list...



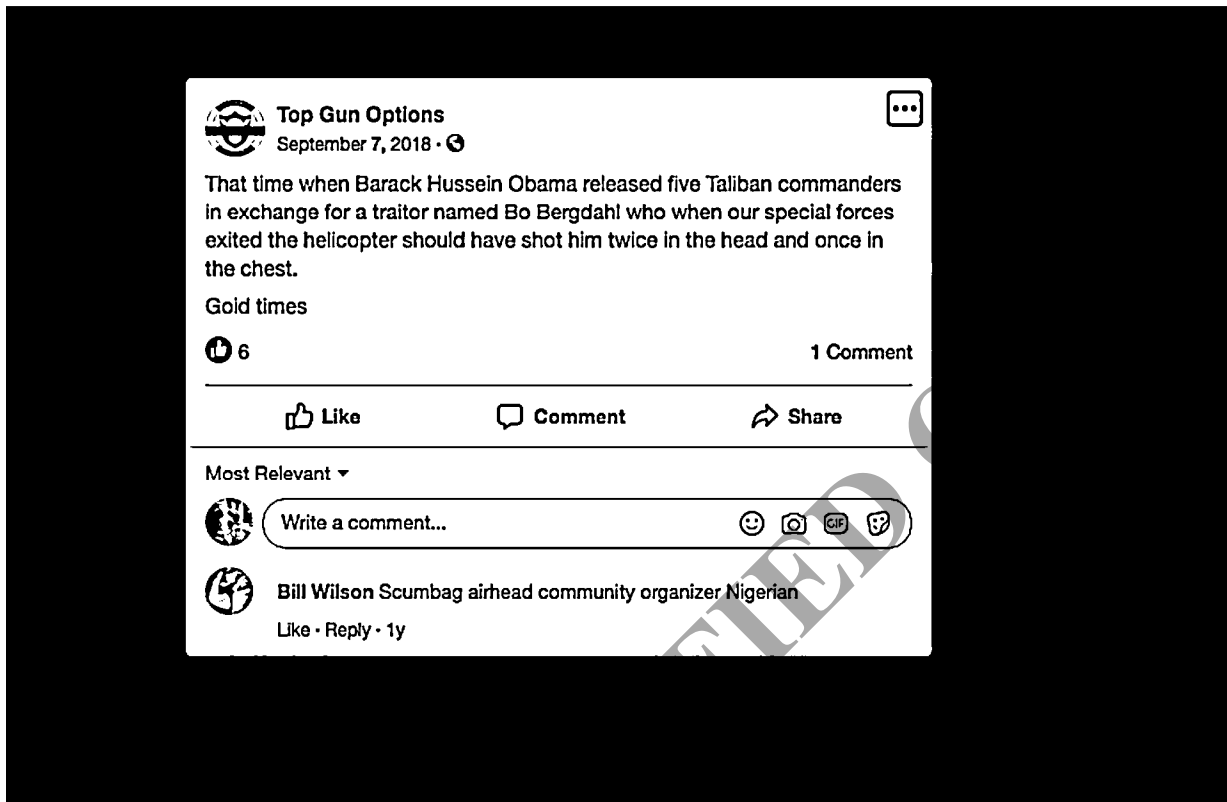
FOXNEWS.COM  
**Disorder in the courts: Federal judge blasts Chief Justice John Roberts**

👍 11      2 Comments

c.



d.



44. Defendants Mr. Buckley and Top Gun Options, LLC, hold themselves out as a reputable, successful, and prosperous individual and company as part of their marketing to the public, including their alleged successful returns on trades, despite the fact that Defendant Mr. Buckley has consecutive years (2014-2016) of IRS tax liens filed against him in approximately 2018 in the public domain.

### **C. Does One Through Twenty-Five**

45. Plaintiff is uninformed as to the true names and capacities of the Defendants sued herein as DOES 1 through 25. Plaintiff therefore sues these defendants by such fictitious names and will amend this Complaint to allege the true names and capacities when they are ascertained.

46. Plaintiff believes and thereon alleges that each fictitiously named defendant is responsible in some manner for the occurrences herein alleged, and that Plaintiff's injuries and

damages as herein alleged are directly, proximately, and/or legally caused by defendants and all of their acts.

47. Plaintiff believes and thereon alleges that each of these defendants named herein as DOES are the agents, employers, representatives, or employees of the named defendants and when performing the acts alleged herein, were acting within the scope of their agency, employment and/or representative capacity and are therefore responsible for the acts complained of herein.

#### **D. Defamatory Statements**

48. On or about June 8, 2017, Mr. Moore authored an article on tradingschools.org entitled, “Top Gun Options: A Paper Tiger?” located at <https://www.tradingschools.org/reviews/top-gun-options/>.

49. Said article reviewed the trading services offered by Defendants Mr. Buckley and Top Gun Options, LLC, and the article was unbiased, truthful and directed to the general public as a matter of public interest.

50. Mr. Moore’s blog permits public comments in a separate section.

51. On or about April 11, 2020, Mr. Buckley, on his Top Gun Options, LLC Facebook page authored the following statement:

“Not sure when I relinquished control of what content is posed on this page...oh yeah, that’s right...I didn’t.

Don’t let the door hit you

You mean these reviews right? **Not the ‘review’ from a Wall Street felon who tried to extort money from us for a ‘good review’? Yeah, the attorney general is on that one.**” (emphasis added)(“False Statement”)(See Exhibit 1)

52. Mr. Moore did not and has never “extorted” an individual or company for a good or poor review on his blog, nor has he ever asked for money to not write a review.

53. On information and belief, Mr. Buckley solicited his membership for ideas on how to further falsely accuse Mr. Moore of the crime of extortion in order to ironically extort Mr. Moore by way of a frivolous lawsuit.

54. Just a few months after Plaintiff wrote his article about Defendants, a series of false and defamatory statements appeared on a review website called trustpilot.com about Plaintiff as follows: (referred to as the “Trust Pilot Reviews”)

a. An individual named “Jack” wrote on November 24, 2017, that “Bunch of scammers, these guys purposely write reviews on sites to black mail [sic], the site pay the most they rank them to the top. do not believe what they say, always take the opposite of what they say!”

b. An individual calling himself “Mike Walton” wrote on April 30, 2019 that “Shady, Extortion, Complete Lies... This guy just writes bad and negative reviews so that later on you fork over money so that he takes it down... the fact is we have freedom of the press now so of course, he can write what he wants, but just about all of it is fake so that he can extort money from you. Just read his bio - he went to prison. Come on.”

c. An individual calling herself “Melissa” wrote on July 23, 2019 that “This is the most dishonest company on the internet. Complete fabrication and lies coming from a delusional past con man Emmett Moore. Please do your due diligence and research this incredibly malicious individual who is literally out to destroy peoples [sic] hard earner reputations and businesses. Unbelievable, you'll get what's coming to you one day.”

d. An individual calling himself “Peter” wrote on September 8, 2020, that “This website uses smear tactics of people who run trading rooms and then trys [sic] to extort them into giving their trading records. Digs up dirt on peolc [sic] without any real

assessment that is valueable [sic]. Tactics are that of trolls. I do not reccomend [sic] taking trading room advice from these people.”

e. On October 29, 2020, an individual calling himself “Roger Davidson” wrote the following: “Biggest scammer of them all. Writes fake reviews about those not willing to pay him. Notice all his positive reviews he has written are for people who are compensating him via "affiliate deal" . He extorts money with blackmail of writing a bad review, if he is not paid. Then if you give him money, he writes a positive review. Scammer.”

f. An individual calling himself “Andrew” wrote on December 28, 2020, that “Not the most honest company. They write good reviews themselves on their website, but this is not true.”

55. On or about May 22, 2020, Mr. Buckley and Top Gun Options, LLC, did in fact file a meritless lawsuit which falsely alleged Mr. Moore asked for money in exchange for not writing a review of Mr. Buckley, and further claimed that Defendants had suffered reputational harm.

**COUNT I**  
**Defamation Per Se as to Defendants**  
**Mr. Buckley and Top Gun Options, LLC,**  
**And DOES 1 through 25**

56. Plaintiff incorporates by references all allegations and facts in paragraphs 1 to 55, as if fully set forth herein.

57. Plaintiff requested Defendants Edward Buckley and Top Gun Options, LLC retract Defendants’ False Statement on October 2, 2020, via email to their last counsel of record.

Exhibit 1 demonstrates that the False Statement alleged herein to have been published on April 11, 2020, is still on Defendant Top Gun Options, LLC’s Facebook page.

58. A Facebook user by the name of “Bryant Meldrum” stated on Defendant Top Gun Options, LLC’s Facebook page the following statement, “Not sure how this [a political comment] is related to options. Maybe its [sic] time to go. There are other sites that are good. The reviews must be true.”

59. Plaintiff’s article regarding Defendants specifically mentioned Defendants’ extreme politics and violent rantings, and as such, “Bryant Meldrum” was referring to Plaintiff’s blog article about Defendants Top Gun Options, LLC and Mr. Buckley.

60. Defendant Mr. Buckley reasonably believed the statement was referring to Plaintiff’s blog article regarding Mr. Buckley and Top Gun Options, LLC, and specifically responded as follows: “Not the ‘review’ from a Wall Street felon who tried to extort money from us for a ‘good review’?” (“False Statement”).

61. Defendants Top Gun Options, LLC and Mr. Buckley were referring to Plaintiff Mr. Moore when they called him “a Wall Street felon,” as it is a fact disclosed to Plaintiff’s readers that he has an over twenty-year-old conviction for fraud, and because Mr. Buckley subsequently filed a complaint over a month later referring to Plaintiff as a felon and a person who allegedly extorted Defendants.

62. Mr. Buckley authored and published the False Statement that Plaintiff extorted him for money to write a review.

63. Plaintiff did not extort Defendants in any way, and the statement is a false allegation of fact.

64. Defendants Mr. Buckley and Top Gun Options, LLC knew Plaintiff had never extorted Defendants or anyone for money when he authored and published the False Statement.

65. Defendants Mr. Buckley and Top Gun Options, LLC published the False Statement online, in a public Facebook page that on information and belief, is accessible by the public at large.

66. On information and belief, the statement was read or reviewed by approximately 5,000 of Defendants' Facebook "friends."

67. Defendants Mr. Buckley and Top Gun Options, LLC published the statement with malice and utter disregard for the truth in order to harm Plaintiff, and portray themselves as victims to obtain money from Plaintiff.

68. Defendants Mr. Buckley and Top Gun Options, LLC published the statement with the intent to discredit Plaintiff and his blog article, for Defendants' own personal gain.

69. On information and belief, Defendants Mr. Buckley and Top Gun Options, LLC, have solicited defamation about Plaintiff from individuals with malice and for their personal gain.

70. Extorting someone for money is a felony crime punishable with prison time, and is a crime of moral turpitude.

71. The False Statement has and does harm Plaintiff's reputation.

72. The False Statement portrays Plaintiff as a person willing to engage in crime for money, instead of as an unbiased and highly effective writer of matters of public interest.

73. Anyone reading the False Statement would erroneously conclude Plaintiff was guilty of the felony crime of extortion and a crime of moral turpitude.

74. Anyone reading the False Statement would be deterred from doing business with Plaintiff, or subscribing (or "clicking") Plaintiff's blog articles due to the alleged criminal conduct in the False Statement.

75. Any contacts Mr. Moore has, including those with the FBI, CFTC, SEC, or FTC would read the False Statement and would conclude that Mr. Moore is no longer credible as a whistleblower, and in fact, one investigator has already stated that they have concerns based upon Mr. Buckley's False Statement.

76. In light of Mr. Buckley's public record and business activities, it is alleged herein that Defendant Mr. Buckley is seeking the result stated, *supra* paragraph 75 as it insulates Defendant Mr. Buckley from investigatory scrutiny, and demonstrates his malice towards Mr. Moore.

77. As such, Plaintiff's reputation has been harmed and he has suffered additional damages in the form of lost revenue in advertising and readership.

78. Defendant Mr. Buckley has a habit of making false public statements on social media and in litigation.

79. Defendant Mr. Buckley falsely claimed he reported Plaintiff to the attorney general's office in the statements listed *supra*, paragraph 51, when in fact, no report was ever made and a public records request resulted instead in numerous complaints about Defendants Mr. Buckley and/or Top Gun Options, LLC, and also revealed the attorney general had investigated Mr. Buckley's actions and/or omissions.

80. Defendants' False Statement constitutes actionable defamation, and defamation *per se*.

81. Furthermore, on information and belief, named Defendants have hired others (Does 1 through 25) to write the statements listed *supra* and referred to as the "Trust Pilot Reviews." The "Trust Pilot Reviews" repeat the same defamatory statements as Defendants' "False Statement" as they repeat the false allegation over and over that Plaintiff extorts people for money, that Plaintiff is a con man or a scammer, and that Plaintiff is not honest or is deceitful.

82. The “Trust Pilot Reviews” are defamatory on their face, constitute Defamation *per se*, and are viewable by the general public on the internet at trustpilot.com when they search the review site for Plaintiff’s blog, “Tradingschools.org.”

83. Upon information and belief DOES 1 through 25 published the Trust Pilot Reviews at the hiring of the named Defendants, and as such, the commentors in the Trust Pilot Reviews were acting as employees or agents of Defendants. In so doing, the named Defendants are believed to be legally responsible for the statements, and the harm they have caused Plaintiff, including loss of reputation and loss of income.

84. If the named Defendants are not legally responsible for the false and defamatory statements in the “Trust Pilot Reviews,” then Does 1 through 25 are legally responsible for publishing the statements, and the harm they have caused Plaintiff, including loss of reputation and loss of income.

85. Defendants and Does 1 through 25 committed the acts alleged *supra*, and by publishing the false and defamatory False Statement and Trust Pilot Reviews, committed acts alleged herein maliciously, with reckless disregard for the truth, fraudulently, oppressively and/or with the wrongful intention of injuring Plaintiff, and acted with improper and evil motive amounting to malice or despicable conduct.

**COUNT II**  
**Violation of Florida’s**  
**Deceptive and Unfair Trade Practices Act**  
**Florida Statute Sec. 501.201, et. seq., as to**  
**Defendants Edward Buckley and Top Gun Options, LLC**

86. Plaintiff hereby adopts and incorporates and re-allege Paragraphs 1 through 85 as if fully set forth herein.



87. This cause of action is brought pursuant to the Florida Deceptive and Unfair Trade Practices Act (“FDUTPA”), as set forth in Florida Statutes, Secs. 501.201 through 501.213.

88. The express purpose of FDUTPA is “[t]o protect the consuming public and legitimate business enterprises from those who engage in unfair methods of competition, or unconscionable, deceptive, or unfair acts or practices in the conduct of any trade or commerce.” Sec. 501.202(2).

89. Although Plaintiff is not a direct competitor of Defendants, Plaintiff is a “consumer” as defined by Florida Statute, Section 501.203, and case law.

90. Defendants are engaged in trade and commerce within the meaning of FDUTPA.

91. Section 501.204(1) declares as unlawful “unconscionable acts or practices, and unfair or deceptive acts or practices in the conduct of any trade or commerce.”

92. Defendants violated FDUTPA as follows:

- a) Defendants have claimed substantial profits and gains in their “portfolios,” despite a public record indicating near zero or negative year-to-date balance on their brokerage accounts.
- b) Defendants claim substantial profits and gains despite several IRS notice of liens for unpaid taxes for tax years 2014-2016.
- c) On information and belief, Defendants will at times lose money in their “fake” or “simulated” trading account and inject additional “fake” or “paper money” to compensate for their losses without disclosure to the public.
- d) Defendants manage and operate approximately a dozen known brokerage accounts, despite not being registered as a broker and/or without proper licensing as is believed to be required by FINRA, the State of Florida, and the SEC, as alleged *supra* ¶ 35.

- e) Defendants removed from public and federal and state regulatory review or completely deleted many of their YouTube videos after the FTC announced “Operation Income Illusion” in or about mid-December, which seeks to weed out deceptive and unfair practices such as the ones Defendants utilize in their marketing of paper trading and coaching for prospective option trading students.
- f) In November 2020, Defendants claimed earning \$2,139,000.00 in one month of “documented trades,” however on information and belief Defendants’ brokerage account for that same period of time reflected only approximately 1/5 of that amount in his balance.
- g) Defendants retaliated against Plaintiff with malice for his unbiased and truthful review in the public interest regarding Defendants by posting false and defamatory statements about Plaintiff and hiring or otherwise directly, proximately, and or being the legal cause for others to publish similar defamatory statements about Plaintiff in retaliation for Plaintiff’s review. (hereinafter “Wrongful Acts”).

93. Defendants have violated FDUTPA by engaging in the Wrongful Acts detailed above, which offend public policies and are immoral, unethical, unscrupulous, and substantially injurious to consumers in and out of the State of Florida.

94. Defendants’ Wrongful Acts have injured the public, and in particular, Plaintiff who has suffered loss of income and loss of goodwill and reputation via Defendants’ and/or DOES 1 through 25’s false and defamatory statements.

95. In particular, Plaintiff has suffered from Defendants’ retaliatory conduct, as have his readership and the public at large due to Plaintiff’s Wrongful Acts.

96. Plaintiff has or will soon hire a reputation management service or individual to combat the wrongful and defamatory statements Plaintiff and/or others have caused him which are the subject of this Complaint.

97. Consumers acting reasonably have been aggrieved by Defendants' Wrongful Acts in violation of FDUTPA in that they distrust the words of Plaintiff in his blog and blog article, and erroneously believe that Plaintiff is an ethical, honest and talented broker or coach in matters relating to the trading of options.

98. By committing the Wrongful Acts, Defendants engaged in and continues to engage in unlawful acts that are in violation of Florida law.

99. Pursuant to Sections 501.211(2) and 501.210, Plaintiff makes a claim for damages, attorneys' fees if and when appropriate, and costs. The damages Plaintiff suffered were directly, proximately and/or legally caused by Defendants' Wrongful Acts. Additionally, Plaintiff seeks injunctive relief for the Court to enjoin Defendants' above-described Wrongful Acts, and all wrongful acts and practices yet to be discovered and pleaded in this matter.

#### **PRAYER FOR RELIEF**

1. WHEREFORE Plaintiff Emmett Moore prays for the following relief:
  - a. An award of actual and punitive damages in the amount of \$45,000.00;
  - b. Injunctive relief;
  - c. An award of attorneys' fees and costs as applicable by statute or law should Plaintiff retain counsel;
  - d. Any such other and further relief as this Court may deem just and proper or to which Plaintiff may be entitled as a matter of law and equity.

Plaintiff demands a jury trial.

Dated: February 11, 2021

By: \_\_\_/s/ Emmett Moore\_\_\_\_\_

Emmett Moore

*In Pro Per*

1028 Rosario Lane

Vista, CA. 92084

(760) 331-8426

elterriblecobra@gmail.com

(Prepared with the assistance of counsel)

NOT A CERTIFIED COPY

**NOT A CERTIFIED COPY**

Exhibit 1



Bryant Meldrum

Not sure how this is related to options. Maybe its it's time to go. There are other sites that are good. The reviews must be true.

Like · Reply · 43w · Edited



Author

Top Gun Options

Not sure when I relinquished control of what content is posted this page...oh yeah, that's right...I didn't

Don't let the door hit you.

You mean these reviews right? Not the 'review' from a Wall Street felon who tried to extort money from us for a 'good review'? Yeah, the attorney general is on that one.

<https://www.facebook.com/pg/TopGunOptions/reviews>

Like · Reply · 43w · Edited

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